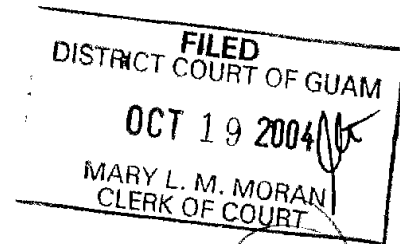


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DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU )  
SADHWANI, and K. SADHWANI'S )  
INC., a Guam corporation, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
HONGKONG AND SHANGHAI )  
BANKING CORPORATION, LTD., )  
et al., )  
 )  
Defendants. )  
 )

CIVIL CASE NO. 03-00036

**MOTION AND MEMORANDUM  
OF POINTS AND AUTHORITIES  
IN SUPPORT OF *EX PARTE*  
APPLICATION OF HSBC**

The Hongkong and Shanghai Banking Corporation, Ltd. ("HSBC"), hereby applies to this Court *ex parte* for an order admitting Roderick A. McLeod, from the firm of Jones Day, *pro hac vice* in this case. This Court has jurisdiction to hear this application pursuant to LR 7.1(j).

As set forth in the Declaration of Jacques G. Bronze, HSBC has given notice to

ORIGINAL

Plaintiffs' counsel.

This application is based on this application, Declaration of Jacques G. Bronze and Richard A. Pipes, Declaration of Roderick A. McLeod, and all pleadings, papers and evidence as will be submitted in connection with this application of hearing.

**DATED** this 16<sup>th</sup> day of October, 2004.

**LAW OFFICES OF BRONZE & TANG**  
**A Professional Corporation**

By: \_\_\_\_\_

  
**JACQUES G. BRONZE**  
*Attorneys for HSBC*